



# **Permit / Application Information Sheet** **Division of Environmental Protection** **West Virginia Office of Air Quality**

<b>Company:</b>	Eagle Natrium LLC	<b>Facility:</b>	Natrium
<b>Region:</b>	1	<b>Plant ID:</b>	051-00002
<b>Engineer:</b>	Kessler, Joe	<b>Application #:</b>	R14-0027E
<b>Physical Address:</b>	15696 Energy Road Proctor WV 26055	<b>Category:</b>	Chemical
<b>County:</b>	Marshall	<b>SIC:</b> [2812] CHEMICALS AND ALLIED PRODUCTS - ALKALIES AND CHLORINE <b>NAICS:</b> [325181] Alkalies and Chlorine Manufacturing  <b>SIC:</b> [2865] CHEMICALS AND ALLIED PRODUCTS - CYCLIC CRUDES AND INTERMEDIATE <b>NAICS:</b> [325110] Petrochemical Manufacturing	
<b>Other Parties:</b>	ENV_MGR - HORAN, J. THOMAS 304 455-2200		

**Information Needed for Database and AIRS**  
 1. Need valid physical West Virginia address with zip

Regulated Pollutants		
CO	Carbon Monoxide	0.000 TPY
	Formaldehyde	0.000 TPY
	Hexane	0.000 TPY
PM10	Particulate Matter < 10 um	0.000 TPY
SO2	Sulfur Dioxide	0.000 TPY
VOC	Volatile Organic Compounds (Reactive organic gases)	0.000 TPY
PM2.5	Particulate Matter < 2.5 um	0.000 TPY
PT	Total Particulate Matter	0.000 TPY
VHAP	VOLATILE ORGANIC HAZARDOUS AIR POLLUTANT	0.000 TPY
NOX	Nitrogen Oxides (including NO, NO2, NO3, N2O3, N2O4, and N2O5)	0.000 TPY

**Summary from this Permit R14-0027E**

Air Programs		Applicable Regulations
MACT		
NSPS		
TITLE V		
Title V/Major		
Fee Program	Fee	Application Type
3A	\$4,500.00	MODIFICATION

**Notes from Database**

Permit Note: Installation of a 99.7 mmBtu/hr Babcock & Wilcox Model RB-747 natural gas-fired boiler. Temporary installation but will be used >180 days.

*Norze*

**Activity Dates**

APPLICATION RECIEVED	02/21/2017 no cd
APPLICATION FEE PAID	02/22/2017
ASSIGNED DATE	02/22/2017
APPLICANT PUBLISHED LEGAL AD	02/22/2017
APPLICATION DEEMED COMPLETE	03/13/2017

**NON-CONFIDENTIAL**

Please note, this information sheet is not a substitute for file research and is limited to data entered into the AIRTRAX database.

Company ID: 051-00002  
 Company: Eagle Natrium LLC  
 Printed: 03/14/2017  
 Engineer: Kessler, Joe

## IPR FILE INDEX

**Applicant :** Eagle Natrium, LLC  
**Facility :** Natrium Plant

**Plant ID No.:** 051-00002  
R14-0027E

Chronological Order - Add Index Pages As Necessary

Date	To	From	Subject	# of pages
2/22/17	Eagle	Sandra Adkins	48-Hour Letter	
2/28/17	Joe Kessler	Eagle	Affidavit of Publication (via e-mail)	
3/13/17	Eagle	Joe Kessler	Completeness Determination	
3/20/17	File	Joe Kessler	DAQ/Eagle E-mails	
3/20/17	File	Joe Kessler	Draft Permit R14-0027E, Evaluation/Fact Sheet, Tracking Manifest	
3/20/17	Various	Sandra Adkins	Public Notice Documents	

JRK  
3/14/17

# AIR QUALITY PERMIT NOTICE

## Notice of Intent to Approve

On February 21, 2017, Eagle Natrium, LLC applied to the WV Department of Environmental Protection, Division of Air Quality (DAQ) for a permit to modify the Natrium Plant located 15696 Energy Road, Proctor, Marshall County, WV at latitude 39.74806 and longitude -80.84889. A preliminary evaluation has determined that all State and Federal air quality requirements will be met by the proposed modification. The DAQ is providing notice to the public of its preliminary determination to issue the permit as R14-0027E.

The following increase in potential emissions will be authorized by this permit action: Particulate Matter less than 10 microns, 2.19 tons per year (TPY); Particulate Matter less than 2.5 microns, 2.19 tons per year (TPY); Particulate Matter, 2.19 TPY; Sulfur Dioxide, 0.26 TPY; Oxides of Nitrogen, 15.97 TPY; Carbon Monoxide, 32.82 TPY; Volatile Organic Compounds, 1.75 TPY; Hazardous Air Pollutants, 0.81 TPY.

Written comments or requests for a public meeting must be received by the DAQ before 5:00 p.m. on XXXXX. A public meeting may be held if the Director of the DAQ determines that significant public interest has been expressed, in writing, or when the Director deems it appropriate.

The purpose of the DAQ's permitting process is to make a preliminary determination if the proposed modification will meet all State and Federal air quality requirements. The purpose of the public review process is to accept public comments on air quality issues relevant to this determination. Only written comments received at the address noted below within the specified time frame, or comments presented orally at a scheduled public meeting, will be considered prior to final action on the permit. All such comments will become part of the public record.

Joe Kessler, PE  
WV Department of Environmental Protection  
Division of Air Quality  
601 57th Street, SE  
Charleston, WV 25304  
Telephone: 304/926-0499, ext. 1219  
FAX: 304/926-0478

**NON-CONFIDENTIAL**

Additional information, including copies of the draft permit, application and all other supporting materials relevant to the permit decision may be obtained by contacting the engineer listed above. The draft permit and engineering evaluation can be downloaded at:

[www.dep.wv.gov/daq/Pages/NSRPermitsforReview.aspx](http://www.dep.wv.gov/daq/Pages/NSRPermitsforReview.aspx)



## Kessler, Joseph R

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**From:** Adkins, Sandra K  
**Sent:** Thursday, March 16, 2017 4:07 PM  
**To:** roni.williams@axiall.com  
**Cc:** Kessler, Joseph R  
**Subject:** FW: WV Draft Permit R14-0027E for Eagle Natrium, LLC; Natrium Plant  
**Attachments:** 14-0027E.PDF; Eval14-0027E.PDF; notice.wpd.pdf

I misspelled your address in the original email.

---

**From:** Adkins, Sandra K  
**Sent:** Thursday, March 16, 2017 4:05 PM  
**To:** 'wentworth.paul@epa.gov' <wentworth.paul@epa.gov>; 'bradley.megan@epa.gov' <bradley.megan@epa.gov>; 'tom.horan@axiall.com' <tom.horan@axiall.com>; 'jerry.mullens@axiall.com' <jerry.mullens@axiall.com>; 'roni.williams@axiall.comd' <roni.williams@axiall.comd>  
**Cc:** Durham, William F <William.F.Durham@wv.gov>; McKeone, Beverly D <Beverly.D.Mckeone@wv.gov>; McCumbers, Carrie <Carrie.McCumbers@wv.gov>; Hammonds, Stephanie E <Stephanie.E.Hammonds@wv.gov>; Kessler, Joseph R <Joseph.R.Kessler@wv.gov>; Taylor, Danielle R <Danielle.R.Taylor@wv.gov>; Rice, Jennifer L <Jennifer.L.Rice@wv.gov>; Hammell, Douglas N <Douglas.N.Hammell@wv.gov>; Seevers, Sharon M <Sharon.M.Seevers@wv.gov>  
**Subject:** WV Draft Permit R14-0027E for Eagle Natrium, LLC; Natrium Plant

Please find attached the Draft Permit R14-0027E, Engineering Evaluation, and Public Notice for Eagle Natrium, LLC's Natrium Plant located in Marshall County.

The notice will be published in the *Moundsville Daily Echo* on Monday, March 20, 2017, and the thirty day comment period will end on Wednesday, April 19, 2017.

Should you have any questions or comments, please contact the permit writer, Joe Kessler, at 304 926-0499 x1219.

## Kessler, Joseph R

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**From:** Adkins, Sandra K  
**Sent:** Thursday, March 16, 2017 4:05 PM  
**To:** 'wentworth.paul@epa.gov'; 'bradley.megan@epa.gov'; tom.horan@axiall.com; jerry.mullens@axiall.com; roni.williams@axiall.comd  
**Cc:** Durham, William F; McKeone, Beverly D; McCumbers, Carrie; Hammonds, Stephanie E; Kessler, Joseph R; Taylor, Danielle R; Rice, Jennifer L; Hammell, Douglas N; SeEVERS, Sharon M  
**Subject:** WV Draft Permit R14-0027E for Eagle Natrium, LLC; Natrium Plant  
**Attachments:** 14-0027E.PDF; Eval14-0027E.PDF; notice.wpd.pdf

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## Kessler, Joseph R

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**From:** Adkins, Sandra K  
**Sent:** Thursday, March 16, 2017 4:04 PM  
**To:** Glance, Jacob P  
**Cc:** Kessler, Joseph R  
**Subject:** DAQ Public Notice

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Telephone: 304/926-0499, ext. 1219

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## Kessler, Joseph R

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**From:** Adkins, Sandra K  
**Sent:** Thursday, March 16, 2017 3:38 PM  
**To:** Charles Walton  
**Cc:** Kessler, Joseph R  
**Subject:** RE: Publication of Class I Legal Ad for the WV Division of Air Quality

Thank you!

**From:** Charles Walton [mailto:mdsvecho@gmail.com]  
**Sent:** Thursday, March 16, 2017 3:28 PM  
**To:** Adkins, Sandra K <Sandra.K.Adkins@wv.gov>  
**Subject:** Re: Publication of Class I Legal Ad for the WV Division of Air Quality

received

On Thu, Mar 16, 2017 at 1:53 PM, Adkins, Sandra K <[Sandra.K.Adkins@wv.gov](mailto:Sandra.K.Adkins@wv.gov)> wrote:

Please publish the information below as a Class I legal advertisement (one time only) in the Monday, March 20, 2017, issue of the *Moundsville Daily Echo*. Please let me know that this has been received and will be published as requested. Thank you.

Send the invoice for payment and affidavit of publication to:

**Sandra Adkins**

**WV Department of Environmental Protection**

**DIVISION OF AIR QUALITY**

**601- 57th Street**

**Charleston, WV 25304**

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*West Virginia Department of Environmental Protection*  
*Jim Justice*  
*Governor*

*Division of Air Quality*

*Austin Caperton*  
*Cabinet Secretary*

# Permit to Modify



*Entire Document*  
**NON-CONFIDENTIAL**

**R14-0027E**

*This permit is issued in accordance with the West Virginia Air Pollution Control Act (West Virginia Code §§22-5-1 et seq.) and 45 C.S.R. 13 – Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation. The permittee identified at the above-referenced facility is authorized to construct the stationary sources of air pollutants identified herein in accordance with all terms and conditions of this permit.*

*Issued to:*  
**Eagle Natrium LLC**  
**Natrium Plant/New Martinsville**  
**051-00002**

**DRAFT**

---

*William F. Durham*  
*Director*

*Issued: DRAFT*

DRAFT

*This permit will supercede and replace Permit R14-0027D issued on July 1, 2014.*

Facility Location: 15696 Energy Road  
Proctor, WV 26055  
Mailing Address: P.O. Box 191  
New Martinsville, WV 26155-0191  
Facility Description: Chemical Manufacturing  
SIC/NAICS Codes: (2812, 2865)/(325181, 325110)  
UTM Coordinates: 512.7 km Easting • 4,399.6 km Northing • Zone 17  
Latitude/Longitude: 39.748056°/-80.848889°  
Permit Type: Modification  
Description of Change: Installation of a 99.9 mmBtu/hr Babcock & Wilcox Model RB-747 natural gas-fired boiler.

*Any person whose interest may be affected, including, but not necessarily limited to, the applicant and any person who participated in the public comment process, by a permit issued, modified or denied by the Secretary may appeal such action of the Secretary to the Air Quality Board pursuant to article one [§§22B-1-1 et seq.], Chapter 22B of the Code of West Virginia. West Virginia Code §§22-5-14.*

*The source is subject to 45CSR30. Changes authorized by this permit must also be incorporated into the facility's Title V operating permit. Commencement of the operations authorized by this permit shall be determined by the appropriate timing limitations associated with Title V permit revisions per 45CSR30.*



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### 1.0. Emission Units

Emission Unit ID	Emission Point ID	Emission Unit Description	Year Installed	Design Capacity	Control Device
R011	S076	No.3 Boiler	Shutdown 7/8/16	243 MMBtu/hr	FF (FF001)
R015	S076	No. 4 Boiler	Shutdown 8/6/16	496 MMBtu/hr	ESP (ES002)
R072	S482	No.5 Boiler (fired by natural-gas)	1966/2016	1,125 MMBtu/hr	None
R097	S076	No. 6 Boiler with Low-NO <sub>x</sub> Burner (fired by 100% hydrogen or natural gas)	1993/2015	182 MMBTU	None
R200	S200	Babcock & Wilcox Model RB-747 Rental Boiler (fired by natural gas)	2017	99.9 MMBTU	None

FF – Fabric Filter Baghouse

ESP – Electrostatic Precipitator

## 2.0. General Conditions

### 2.1. Definitions

- 2.1.1. All references to the “West Virginia Air Pollution Control Act” or the “Air Pollution Control Act” mean those provisions contained in W.Va. Code §§ 22-5-1 to 22-5-18.
- 2.1.2. The “Clean Air Act” means those provisions contained in 42 U.S.C. §§ 7401 to 7671q, and regulations promulgated thereunder.
- 2.1.3. “Secretary” means the Secretary of the Department of Environmental Protection or such other person to whom the Secretary has delegated authority or duties pursuant to W.Va. Code §§ 22-1-6 or 22-1-8 (45CSR§30-2.12.). The Director of the Division of Air Quality is the Secretary’s designated representative for the purposes of this permit.
- 2.1.4. Unless otherwise specified in a permit condition or underlying rule or regulation, all references to “rolling yearly total” shall mean the sum of the monthly data, values or parameters being measured, monitored, or recorded, at any given time for the previous twelve (12) consecutive calendar months.

### 2.2. Acronyms

<b>CAAA</b>	Clean Air Act Amendments	<b>NO<sub>x</sub></b>	Nitrogen Oxides
<b>CBI</b>	Confidential Business Information	<b>NSPS</b>	New Source Performance Standards
<b>CEM</b>	Continuous Emission Monitor	<b>PM</b>	Particulate Matter
<b>CES</b>	Certified Emission Statement	<b>PM<sub>2.5</sub></b>	Particulate Matter less than 2.5 µm in diameter
<b>C.F.R. or CFR</b>	Code of Federal Regulations	<b>PM<sub>10</sub></b>	Particulate Matter less than 10µm in diameter
<b>CO</b>	Carbon Monoxide	<b>Ppb</b>	Pounds per Batch
<b>C.S.R. or CSR</b>	Codes of State Rules	<b>Pph</b>	Pounds per Hour
<b>DAQ</b>	Division of Air Quality	<b>Ppm</b>	Parts per Million
<b>DEP</b>	Department of Environmental Protection	<b>Ppm<sub>v</sub> or ppm<sub>v</sub></b>	Parts per Million by Volume
<b>dscm</b>	Dry Standard Cubic Meter	<b>PSD</b>	Prevention of Significant Deterioration
<b>FOIA</b>	Freedom of Information Act	<b>Psi</b>	Pounds per Square Inch
<b>HAP</b>	Hazardous Air Pollutant	<b>SIC</b>	Standard Industrial Classification
<b>HON</b>	Hazardous Organic NESHAP	<b>SIP</b>	State Implementation Plan
<b>HP</b>	Horsepower	<b>SO<sub>2</sub></b>	Sulfur Dioxide
<b>lbs/hr</b>	Pounds per Hour	<b>TAP</b>	Toxic Air Pollutant
<b>LDAR</b>	Leak Detection and Repair	<b>TPY</b>	Tons per Year
<b>M</b>	Thousand	<b>TRS</b>	Total Reduced Sulfur
<b>MACT</b>	Maximum Achievable Control Technology	<b>TSP</b>	Total Suspended Particulate
<b>MDHI</b>	Maximum Design Heat Input	<b>USEPA</b>	United States Environmental Protection Agency
<b>MM</b>	Million	<b>UTM</b>	Universal Transverse Mercator
<b>MMBtu/hr or mmbtu/hr</b>	Million British Thermal Units per Hour	<b>VEE</b>	Visual Emissions Evaluation
<b>MMCF/hr or mmcf/hr</b>	Million Cubic Feet per Hour	<b>VOC</b>	Volatile Organic Compounds
<b>NA</b>	Not Applicable	<b>VOL</b>	Volatile Organic Liquids
<b>NAAQS</b>	National Ambient Air Quality Standards		
<b>NESHAPS</b>	National Emissions Standards for Hazardous Air Pollutants		

### **2.3. Authority**

This permit is issued in accordance with West Virginia Air Pollution Control Act W.Va. Code §§ 22-5-1. et seq. and the following Legislative Rules promulgated thereunder:

- 2.3.1. 45CSR13 – *Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits and Procedures for Evaluation;*
- 2.3.2. 45CSR14 – *Permits for Construction and Major Modification of Major Stationary Sources of Air Pollution for the Prevention of Significant Deterioration;*

### **2.4. Term and Renewal**

- 2.4.1. This permit supersedes and replaces previously issued Permit R14-0027D. This Permit shall remain valid, continuous and in effect unless it is revised, suspended, revoked or otherwise changed under an applicable provision of 45CSR13 or any other applicable legislative rule;

### **2.5. Duty to Comply**

- 2.5.1. The permitted facility shall be constructed and operated in accordance with the plans and specifications filed in Permit Application R13-1637, R13-1637A, R14-0027, R14-0027A, R14-0027B, R14-0027C, R14-0027D, R14-0027E, and any modifications, administrative updates, or amendments thereto. The Secretary may suspend or revoke a permit if the plans and specifications upon which the approval was based are not adhered to;  
[45CSR§§13-5.11 and 10.3.]
- 2.5.2. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the West Virginia Code and the Clean Air Act and is grounds for enforcement action by the Secretary or USEPA;
- 2.5.3. Violations of any of the conditions contained in this permit, or incorporated herein by reference, may subject the permittee to civil and/or criminal penalties for each violation and further action or remedies as provided by West Virginia Code 22-5-6 and 22-5-7;
- 2.5.4. Approval of this permit does not relieve the permittee herein of the responsibility to apply for and obtain all other permits, licenses, and/or approvals from other agencies; i.e., local, state, and federal, which may have jurisdiction over the construction and/or operation of the source(s) and/or facility herein permitted.

### **2.6. Duty to Provide Information**

The permittee shall furnish to the Secretary within a reasonable time any information the Secretary may request in writing to determine whether cause exists for administratively updating, modifying, revoking, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Secretary copies of records to be kept by the permittee. For information claimed to be confidential, the permittee shall furnish such records to the Secretary along with a claim of confidentiality in accordance with 45CSR31. If confidential information is to be sent to USEPA, the permittee shall directly provide such information to USEPA along with a claim of confidentiality in accordance with 40 C.F.R. Part 2.

## **2.7. Duty to Supplement and Correct Information**

Upon becoming aware of a failure to submit any relevant facts or a submittal of incorrect information in any permit application, the permittee shall promptly submit to the Secretary such supplemental facts or corrected information.

## **2.8. Administrative Update**

The permittee may request an administrative update to this permit as defined in and according to the procedures specified in 45CSR13.  
[45CSR§13-4.]

## **2.9. Permit Modification**

The permittee may request a minor modification to this permit as defined in and according to the procedures specified in 45CSR13.  
[45CSR§13-5.4.]

## **2.10 Major Permit Modification**

The permittee may request a major modification as defined in and according to the procedures specified in 45CSR14 or 45CSR19, as appropriate.  
[45CSR§13-5.1]

## **2.11. Inspection and Entry**

The permittee shall allow any authorized representative of the Secretary, upon the presentation of credentials and other documents as may be required by law, to perform the following:

- a. At all reasonable times (including all times in which the facility is in operation) enter upon the permittee's premises where a source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect at reasonable times (including all times in which the facility is in operation) any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- d. Sample or monitor at reasonable times substances or parameters to determine compliance with the permit or applicable requirements or ascertain the amounts and types of air pollutants discharged.

## **2.12. Emergency**

- 2.12.1. An "emergency" means any situation arising from sudden and reasonable unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by

improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

2.12.2. Effect of any emergency. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the conditions of Section 2.12.3 are met.

2.12.3. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

- a. An emergency occurred and that the permittee can identify the cause(s) of the emergency;
- b. The permitted facility was at the time being properly operated;
- c. During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and
- d. The permittee submitted notice of the emergency to the Secretary within one (1) working day of the time when emission limitations were exceeded due to the emergency and made a request for variance, and as applicable rules provide. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.

2.12.4. In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof.

2.12.5 The provisions of this section are in addition to any emergency or upset provision contained in any applicable requirement.

## **2.13. Need to Halt or Reduce Activity Not a Defense**

It shall not be a defense for a permittee in an enforcement action that it should have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. However, nothing in this paragraph shall be construed as precluding consideration of a need to halt or reduce activity as a mitigating factor in determining penalties for noncompliance if the health, safety, or environmental impacts of halting or reducing operations would be more serious than the impacts of continued operations.

## **2.14. Suspension of Activities**

In the event the permittee should deem it necessary to suspend, for a period in excess of sixty (60) consecutive calendar days, the operations authorized by this permit, the permittee shall notify the Secretary, in writing, within two (2) calendar weeks of the passing of the sixtieth (60) day of the suspension period.

## **2.15. Property Rights**

This permit does not convey any property rights of any sort or any exclusive privilege.

**2.16. Severability**

The provisions of this permit are severable and should any provision(s) be declared by a court of competent jurisdiction to be invalid or unenforceable, all other provisions shall remain in full force and effect.

**2.17. Transferability**

This permit is transferable in accordance with the requirements outlined in Section 10.1 of 45CSR13. [45CSR§13-10.1.]

**2.18. Notification Requirements**

The permittee shall notify the Secretary, in writing, no later than thirty (30) calendar days after the actual startup of the operations authorized under this permit.

**2.19. Credible Evidence**

Nothing in this permit shall alter or affect the ability of any person to establish compliance with, or a violation of, any applicable requirement through the use of credible evidence to the extent authorized by law. Nothing in this permit shall be construed to waive any defense otherwise available to the permittee including, but not limited to, any challenge to the credible evidence rule in the context of any future proceeding.

### 3.0. Facility-Wide Requirements

#### 3.1. Limitations and Standards

- 3.1.1. **Open burning.** The open burning of refuse by any person, firm, corporation, association, or public agency is prohibited except as noted in 45CSR§6-3.1.  
[45CSR§6-3.1.]
- 3.1.2. **Open burning exemptions.** The exemptions listed in 45CSR§6-3.1 are subject to the following stipulation: Upon notification by the Secretary, no person shall cause, suffer, allow or permit any form of open burning during existing or predicted periods of atmospheric stagnation. Notification shall be made by such means as the Secretary may deem necessary and feasible.  
[45CSR§6-3.2.]
- 3.1.3. **Asbestos.** The permittee is responsible for thoroughly inspecting the facility, or part of the facility, prior to commencement of demolition or renovation for the presence of asbestos and complying with 40 C.F.R. § 61.145, 40 C.F.R. § 61.148, and 40 C.F.R. § 61.150. The permittee, owner, or operator must notify the Secretary at least ten (10) working days prior to the commencement of any asbestos removal on the forms prescribed by the Secretary if the permittee is subject to the notification requirements of 40 C.F.R. § 61.145(b)(3)(i). The USEPA, the Division of Waste Management, and the Bureau for Public Health - Environmental Health require a copy of this notice to be sent to them.  
[40CFR§61.145(b) and 45CSR§34]
- 3.1.4. **Odor.** No person shall cause, suffer, allow or permit the discharge of air pollutants which cause or contribute to an objectionable odor at any location occupied by the public.  
[45CSR§4-3.1] *[State Enforceable Only]*
- 3.1.5. **Permanent shutdown.** A source which has not operated at least 500 hours in one 12-month period within the previous five (5) year time period may be considered permanently shutdown, unless such source can provide to the Secretary, with reasonable specificity, information to the contrary. All permits may be modified or revoked and/or reapplication or application for new permits may be required for any source determined to be permanently shutdown.  
[45CSR§13-10.5.]
- 3.1.6. **Standby plan for reducing emissions.** When requested by the Secretary, the permittee shall prepare standby plans for reducing the emissions of air pollutants in accordance with the objectives set forth in Tables I, II, and III of 45CSR11.  
[45CSR§11-5.2.]

#### 3.2. Monitoring Requirements *[Reserved]*

#### 3.3. Testing Requirements

- 3.3.1. **Stack testing.** As per provisions set forth in this permit or as otherwise required by the Secretary, in accordance with the West Virginia Code, underlying regulations, permits and orders, the permittee shall conduct test(s) to determine compliance with the emission limitations set forth in this permit and/or established or set forth in underlying documents. The Secretary, or his duly authorized representative, may at his option witness or conduct such test(s). Should the Secretary



exercise his option to conduct such test(s), the operator shall provide all necessary sampling connections and sampling ports to be located in such manner as the Secretary may require, power for test equipment and the required safety equipment, such as scaffolding, railings and ladders, to comply with generally accepted good safety practices. Such tests shall be conducted in accordance with the methods and procedures set forth in this permit or as otherwise approved or specified by the Secretary in accordance with the following:

- a. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with 40 C.F.R. Parts 60, 61, and 63 in accordance with the Secretary's delegated authority and any established equivalency determination methods which are applicable. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit may be revised in accordance with 45CSR§13-4. or 45CSR§13-5.4 as applicable.
- b. The Secretary may on a source-specific basis approve or specify additional testing or alternative testing to the test methods specified in the permit for demonstrating compliance with applicable requirements which do not involve federal delegation. In specifying or approving such alternative testing to the test methods, the Secretary, to the extent possible, shall utilize the same equivalency criteria as would be used in approving such changes under Section 3.3.1.a. of this permit. If a testing method is specified or approved which effectively replaces a test method specified in the permit, the permit may be revised in accordance with 45CSR§13-4. or 45CSR§13-5.4 as applicable.
- c. All periodic tests to determine mass emission limits from or air pollutant concentrations in discharge stacks and such other tests as specified in this permit shall be conducted in accordance with an approved test protocol. Unless previously approved, such protocols shall be submitted to the Secretary in writing at least thirty (30) days prior to any testing and shall contain the information set forth by the Secretary. In addition, the permittee shall notify the Secretary at least fifteen (15) days prior to any testing so the Secretary may have the opportunity to observe such tests. This notification shall include the actual date and time during which the test will be conducted and, if appropriate, verification that the tests will fully conform to a referenced protocol previously approved by the Secretary.
- d. The permittee shall submit a report of the results of the stack test within sixty (60) days of completion of the test. The test report shall provide the information necessary to document the objectives of the test and to determine whether proper procedures were used to accomplish these objectives. The report shall include the following: the certification described in paragraph 3.5.1.; a statement of compliance status, also signed by a responsible official; and, a summary of conditions which form the basis for the compliance status evaluation. The summary of conditions shall include the following:
  1. The permit or rule evaluated, with the citation number and language;
  2. The result of the test for each permit or rule condition; and,
  3. A statement of compliance or noncompliance with each permit or rule condition.

[WV Code § 22-5-4(a)(14-15) and 45CSR13]

### 3.4. Recordkeeping Requirements

- 3.4.1. **Retention of records.** The permittee shall maintain records of all information (including monitoring data, support information, reports, and notifications) required by this permit recorded

in a form suitable and readily available for expeditious inspection and review. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation. The files shall be maintained for at least five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two (2) years of data shall be maintained on site. The remaining three (3) years of data may be maintained off site, but must remain accessible within a reasonable time. Where appropriate, the permittee may maintain records electronically (on a computer, on computer floppy disks, CDs, DVDs, or magnetic tape disks), on microfilm, or on microfiche.

- 3.4.2. **Odors.** For the purposes of 45CSR4, the permittee shall maintain a record of all odor complaints received, any investigation performed in response to such a complaint, and any responsive action(s) taken.

**[45CSR§4. State Enforceable Only.]**

### 3.5. Reporting Requirements

- 3.5.1. **Responsible official.** Any application form, report, or compliance certification required by this permit to be submitted to the DAQ and/or USEPA shall contain a certification by the responsible official that states that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- 3.5.2. **Confidential information.** A permittee may request confidential treatment for the submission of reporting required by this permit pursuant to the limitations and procedures of W.Va. Code § 22-5-10 and 45CSR31.
- 3.5.3. **Correspondence.** All notices, requests, demands, submissions and other communications required or permitted to be made to the Secretary of DEP and/or USEPA shall be made in writing and shall be deemed to have been duly given when delivered by hand, or mailed first class with postage prepaid to the address(es), or submitted in electronic format by email as set forth below or to such other person or address as the Secretary of the Department of Environmental Protection may designate:

**If to the DAQ:**

Director  
WVDEP  
Division of Air Quality  
601 57<sup>th</sup> Street  
Charleston, WV 25304-2345

**DAQ Compliance and Enforcement<sup>1</sup>:**  
[DAQAirQualityReports@wv.gov](mailto:DAQAirQualityReports@wv.gov)

**If to the US EPA:**

Associate Director  
Office of Air Enforcement and Compliance Assistance  
(3AP20)  
U.S. Environmental Protection Agency  
Region III  
1650 Arch Street  
Philadelphia, PA 19103-2029

<sup>1</sup> For all self-monitoring reports (MACT, GACT, NSPS, etc.), stack tests and protocols, notice of Compliance Status Reports, Initial Notifications, etc.

#### 3.5.4. Operating Fee

- 3.5.4.1. In accordance with 45CSR30 – Operating Permit Program, the permittee shall submit a certified emissions statement and pay fees on an annual basis in accordance with the submittal requirements of the Division of Air Quality. A receipt for the appropriate fee shall be

maintained on the premises for which the receipt has been issued, and shall be made immediately available for inspection by the Secretary or his/her duly authorized representative.

- 3.5.5. **Emission inventory.** At such time(s) as the Secretary may designate, the permittee herein shall prepare and submit an emission inventory for the previous year, addressing the emissions from the facility and/or process(es) authorized herein, in accordance with the emission inventory submittal requirements of the Division of Air Quality. After the initial submittal, the Secretary may, based upon the type and quantity of the pollutants emitted, establish a frequency other than on an annual basis.

#### 4.0. Source-Specific Requirements

##### 4.1. Limitations and Standards

4.1.1. *[Reserved]*

4.1.2. *[Reserved]*

4.1.3. The following conditions and requirements are specific to No. 5 Boiler (ID #R072):

a. *[Reserved]*

b. After the boiler has been converted to natural gas firing, the emission limits in this item are in effect upon the initial restarting from being converted to fire on natural gas. The boiler shall not exceed the following limitations:

- i. CO emissions emitted to the atmosphere from the boiler shall not exceed 0.082 pounds per MMBtu. A new 30-day rolling average emission rate shall be determined on a daily basis and shall be calculated as the average of all the hourly CO emission data for the preceding 30 steam generating unit operating days.
- ii. NO<sub>x</sub> emissions emitted to the atmosphere from the boiler shall not exceed 0.16 pounds per MMBtu. A new 30-day rolling average emission rate shall be determined on a daily basis and shall be calculated as the average of all the hourly NO<sub>x</sub> emission data for the preceding 30 steam generating unit operating days.
- iii. The boiler shall only be fired with “pipeline quality natural gas” as defined in 45 CSR§10A-2.7. Compliance with this condition satisfies compliance with the limitations of 45CSR§2-3.1., 45CSR§2-4.1.b., 45CSR§10-3.1.e.; and the requirement of 45 CSR §2-8.1.a., 45 CSR §2-8.2., and Section 8 of 45 CSR §10.  
**[45 CSR §2-8.4.b., 45 CSR §2A-3.1.a., 45 CSR §10-10.3., and 45CSR §10A-3.1b.]**
- iv. The 24- hour average heat input of the boiler shall be no greater than 999 MMBtu/hr. Compliance with this limit for the boiler shall be satisfied by limiting the annual total heat input into the unit to 8,751,240 MMBtu on 12 month rolling total basis.

4.1.4. The following conditions and requirements are specific to No. 6 Boiler (ID #R097):

- a. CO emissions emitted to the atmosphere from the boiler shall not exceed 0.085 pounds per MMBtu. A new 30-day rolling average emission rate shall be determined on a daily basis and shall be calculated as the average of all the hourly CO emission data for the preceding 30 steam generating unit operating days.
- b. NO<sub>x</sub> emissions emitted to the atmosphere from the boiler shall not exceed 0.04 pounds per MMBtu. A new 30-day rolling average emission rate shall be determined on a daily basis and shall be calculated as the average of all the hourly NO<sub>x</sub> emission data for the preceding 30 steam generating unit operating days.  
**[40 CFR §60.44b(a), (h), and (i)]**
- c. The boiler shall only be fired with hydrogen gas, pipeline quality natural gas or any combination of these two fuels. Compliance with this condition satisfies compliance with the limitations of 45CSR§2-3.1., 45CSR§2-4.1.b., 45CSR§10-3.1.e.; and the requirement of 45 CSR §2-8.1.a., 45 CSR §2-8.2., and Section 8 of 45 CSR §10.  
**[45 CSR §2-8.4.b., 45 CSR §2A-3.1.a., 45 CSR §10-10.3., and 45CSR §10A-3.1b.]**

- d. The hydrogen gas to be fired in the boiler shall not have a concentration of greater than 40 micrograms of mercury per cubic meters of gas after January 31, 2016. The hydrogen gas meeting this standard is classified as an “other gas 1 fuel” under Subpart DDDDDD of Part 63.  
[40 CFR §63.7575]
  - e. The 24-hour average heat input of boiler shall be no greater than 182 MMBtu/hr. Compliance with this limit for the boiler shall be satisfied by limiting the annual total heat input into the unit by 1,594,320 MMBtu on 12 month rolling total basis.
  - f. Natural gas, with an average rating of 906 BTUs per cubic foot, shall be available as a secondary fuel to the boiler for start-up and stabilization procedures during routine boiler operation. Natural gas consumption shall not exceed a maximum of 15,080 cubic feet per hour and  $132.1 \times 10^6$  cubic feet per year.  
[40 CFR §60.44(e)]
  - g. Prior to the conversion, item f of this condition shall be in effect. Upon initial re-start of the unit from conversion modification, item f of this condition is no longer applicable or enforceable.
- 4.1.5. Visible emissions from each of these emission points S076 (No. 6 Boilers Stack) and S482 (No. 5 Boiler) shall not be greater than ten (10) percent opacity based on a six minute block average.  
[45 CSR §2-3.1]
- 4.1.6. Nos. 5 and 6 Boilers shall be equipped, maintained, operated with an oxygen trim system that maintains an optimum air to fuel ratio for each unit. Such system shall be installed up on initial start-up of the unit from the conversion to natural gas retrofit.  
[40 CFR §63.7575]
- 4.1.7. Once the natural gas conversion for Nos. 5 and 6 Boilers has been completed individually, the initial tune-up and subsequent tune-ups for the units shall be conducted in accordance with the following timing and tune-up requirements:
- a. If the initial start-up after the conversion occurs before January 31, 2016, then the initial tune-up for the unit must be completed by no later than January 31, 2016.  
[40 CFR §63.7510(e) & §63.7495(b)]
  - b. If the initial start-up after the conversion occurs after January 31, 2016, then the initial tune-up for the unit shall be completed by no later than 30 calendar days after the initial start-up from the natural gas conversion of the unit.  
[40 CFR §63.7510(j)]
  - c. Subsequent tune-ups shall be completed no later than 61 months after previous tune-up.  
[40 CFR §63.7515(d) § 63.7540(a)(12)]
  - d. Each tune-up shall consist of the following:
    - i. As applicable, inspect the burner, and clean or replace any components of the burner as necessary (permittee may delay the burner inspection until the next scheduled unit shutdown). At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment;

- ii. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available;
- iii. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (you may delay the inspection until the next scheduled unit shutdown);
- iv. Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, which includes the manufacturer's NO<sub>x</sub> concentration specification taken in consideration; and
- v. Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer.

**[40 CFR §63.7500(a)(1), §63.7505(a), §63.7515(d), §§63.7540(a)(10) & (12), and Table 3 to Subpart DDDDD of Part 63—Work Practice Standards]**

- 4.1.8. The permittee shall conduct a "one-time energy assessment" of the facility, which must include Nos. 5 and 6 Boilers, as specified in Table 3 of 40 CFR 63 Subpart DDDDD. Pursuant to 40 CFR §63.7510(e), the energy assessment shall be completed no later than January 31, 2016.  
**[40 CFR §63.7500(a)(1), §63.7505(a), and Table 3 of 40 CFR 63 Subpart DDDDD]**
- 4.1.9. As requested by the permittee on March 19, 2014, the Director hereby grants the permittee an extension for compliance with the HAP emission limitations of Subpart DDDDD of Part 63 of Chapter 40 for Nos. 3, 4, and 5 Boilers in accordance with the following limitations.

No. 5 Boiler may be operated as currently configured burning coal until March 1, 2016.

No. 3. and No.4 Boilers may be operated as currently configured burning coal until December 1, 2016 or 180 days after the restart of No. 5 Boiler as a "Gas 1 Unit", whichever is sooner. Afterward, No. 3 and No. 4 Boilers shall be permanently shut down.

In effort to minimize HAP emissions during the extension, the permittee shall at the minimum implement the following work practices to these units on or before January 31, 2016:

- a. Conduct a tune-up on each unit in accordance with the tune-up requirement of Condition 4.1.7., which include associated records.
- b. The units shall be limited to using natural gas fuel during start-up operations.
- c. Once the unit starts firing pulverized coal, the permittee must begin to operate associated particulate matter control for the unit as expeditiously as possible.
- d. The permittee must operate the associated particulate matter control at all times when the unit is operating.
- e. The permittee shall operate and maintain the oxygen trim system on each unit.
- f. During shut down of the unit, the permittee must continue to operate the associated particulate matter control device.
- g. The permittee must operate the units in accordance with the other applicable limits in this permit.

The permittee shall maintain records of implementing these work practices in accordance with Condition 3.4.1. and following the reporting requirements of Condition 4.5.5.  
[40 CFR §63.6(i) and 45 CSR §14-2.46.h.]

4.1.10. The Rental Boiler, identified as R200, shall meet the following requirements:

- a. The Rental Boiler shall be a Babcock & Wilcox Model RB-747, shall not exceed an aggregate MDHI of 99.9 MMBtu/hr, shall only be fired by pipeline-quality natural gas (PNG), shall utilize Low-NO<sub>x</sub> Burner technology, and shall not exceed those emission limits given in the following table:

**Table 4.1.10(a): Rental Boiler Emission Limits**

Pollutant	PPH	TPY
CO	7.49	32.82
NO <sub>x</sub>	3.65	15.97
PM <sub>2.5</sub> /PM <sub>10</sub> /PM <sup>(1)</sup>	0.50	2.19
VOCs	0.40	1.75

<sup>(1)</sup> Includes condensables.

- b. As the annual emissions are based on 8,760 hours of operation, there is no annual limit on hours of operation or PNG combusted on an annual basis for the Rental Boiler;
- c. Visible emissions from boiler R200 shall not be greater than ten (10) percent opacity based on a six minute block average.  
[45 CSR §2-3.1]
- d. The permittee shall not cause, suffer, allow or permit the discharge of sulfur dioxide into the open air from boiler R200 measured in terms of pounds per hour, in excess of the product of 3.2 and the total design heat of the boilers in million BTU's per hour.  
[45CSR§10-3.1]
- e. The permittee shall meet all applicable requirements as given under 40 CFR 60, Subpart Dc for boiler R200.
- f. The permittee shall meet all applicable requirements for a major source of HAPs as given under 40 CFR 63, Subpart DDDDD for boiler R200.
- 4.1.11. **Operation and Maintenance of Air Pollution Control Equipment.** The permittee shall, to the extent practicable, install, maintain, and operate all pollution control equipment listed in Section 1.0 and associated monitoring equipment in a manner consistent with safety and good air pollution control practices for minimizing emissions, or comply with any more stringent limits set forth in this permit or as set forth by any State rule, Federal regulation, or alternative control plan approved by the Secretary.  
[45CSR§13-5.11.]

## 4.2. Monitoring Requirements

4.2.1. [Reserved]

- 4.2.2. For the purpose of satisfying the monitoring plan requirements of 45 CSR 2, the permittee shall conduct the following monitoring with respect to each unit and associated PM control device:
- a. Conduct either Method 22 or Method 9 as outlined in Appendix A of 40 CFR Part 60, observation once per month for the purpose of verifying or demonstration compliance with the standard in Condition 4.1.4. for the respective emission point. If visible emissions are detected using a Method 22, a Method 9 must be conduct to determine compliance with the actual standard within seven operating days of the Method 22 observation.
  - b. The permittee shall monitor the number of fabric filter compartments online for the fabric filter baghouse (FF0001) and the number of modules on the precipitator T/R Cabinets that are in service for each ESP (ES001 & ES002). The permittee shall make record of the date and time of the changes to the compartments or modules in service and the respective change. For proper operation of the fabric filter baghouse FF001, 5 of the 8 compartment must be in service at all times. For proper operation of the ESP ES001, 6 of the 16 modules must be in service at all times. For proper operation of the ESP ES002, 4 of the 11 modules must be in service at all times.
  - c. For fabric filter bag house FF001 only, the service “status” of each compartment will be monitored on a continuous display panel and the differential pressure across the compartment (recorded every two hours) will be used to determine the status.
  - d. For ESPs ES001 and ES002 only, the primary AC voltage on the T/R Cabinets is displayed in the operations control room, and this value is recorded once per shift. A voltage reading greater than 0 indicates the modules in that T/R Cabinet are in service.
  - e. In the event of an excursion and if practicable, the permittee shall isolated and repair the fabric filter compartment or ESP module. In the event that the number of compartments or modules in service are below the minimum number as list in item b. for the respective control device, the permittee shall conduct a Method 9 observation to determine compliance with the standard in Condition 4.1.5. If the initial observation determines an excursion of the standard, the permittee shall continue to conduct Method 9 observations for each hour during the excursion until four (4) successive six minute observations demonstrated compliance with the standard.

All records of the monitoring and actions taken shall be maintained in accordance with Condition 3.4.1. Once the natural gas conversion of No.5 Boiler is completed and No. 3. and No.4 Boilers are shut-down , the monitoring requirement of this condition is no longer required per 45 CSR §2A-3.1.b.

**[45 CSR §§2-8.2 and 8.3]**

- 4.2.3. For No. 5 Boiler post conversion to natural gas, the permittee shall install, operate, certify and maintain a continuous emission monitoring system (CEMS) for measuring NO<sub>x</sub>, CO, and diluent gas (CO<sub>2</sub> or O<sub>2</sub>) monitoring system from the exhaust of No. 5 Boiler in accordance with the applicable Performance Specifications under Appendix B to Part 60 of Chapter 40 for CO and Part 75 of Chapter 40 for NO<sub>x</sub>, and diluent gas. Such monitor system shall include an automated data acquisition and handling system (DAHS). All required certification tests of the monitoring system must be completed no later than 90 unit operating days or 180 calendar days (whichever is sooner) after initial start-up from the natural gas conversion project.

The permittee may elect to use a predictive emission monitoring system (PEMS) as an alternative monitoring system in lieu of CEMS. Using PEMS, the permittee must have this alternative monitoring system certified under the applicable procedures of Subpart E of 40 CFR 75 and approved by the USEPA Administrator.



The permittee must calculate and record an hourly average or heat input average (respective to the terms of the emission limit for the corresponding pollutant) emission rate on a daily basis for each pollutant identified in this condition for each boiler. CEMS unit conforming to the specifications of 40 CFR Part 75 shall use unbiased, un-substituted data to demonstrate compliance with the limits as specified in this permit.

For purposes of calculating data averages, the permittee cannot use data recorded during periods of monitoring malfunctions, associated repairs, out-of-control periods, required quality assurance or control activities. The permittee must use all the data collected during all other periods in assessing compliance with the emission limit permitted in Condition 4.1.3. Any periods for which the monitoring system is out of control and data are not available for required calculations constitute a deviation from the monitoring requirements. Records of all data collected, calibrations, calibration checks, relative accuracy tests, maintenance performed, and malfunctions of the CEMS/PEMS shall be maintained in accordance with Condition 3.4.1. of this permit.

**[45 CSR §40-71. and 40 CFR §75.20. (NO<sub>x</sub> Monitoring)]**

- 4.2.4. For No. 6 Boiler post conversion to natural gas, the permittee shall install, operate, certify and maintain a continuous emission monitoring system (CEMS) for measuring NO<sub>x</sub>, CO, and either CO<sub>2</sub> or oxygen analyzer according to the applicable procedures under Appendix B, and Appendix F to Part 60 of Chapter 40 on a continuous basis. Such monitor system shall include an automated data acquisition and handling system (DAHS).

The span value for the NO<sub>x</sub> CEMs shall be 500 ppm (40 CFR §60.48b(e)(2)(i)) if applicable.

The permittee must conduct and pass a performance evaluation of the CEMS or PEMS according to the procedures under 40 CFR §60.13. within 180 days after restarting of the boiler.

For NO<sub>x</sub> and CO<sub>2</sub> or O<sub>2</sub> direct measurement only; when NO<sub>x</sub> emission data are not obtained because of CEMS breakdown, repairs, calibration checks, and zero and span adjustment, emission data will be obtained by using standby monitoring systems, Method 7 or 7A of Appendix A of Part 60, or other approved reference methods to provided emission data for a minimum of 75 percent of the operating hours in each steam generating unit operating day, in at least 22 out of the 30 successive steam generating unit operating days. **[40 CFR §60.48b(f)]**

The permittee may elect to use a predictive emission monitoring system (PEMS) as an alternative monitoring system in lieu of CEMS. Such PEMS must meet the Performance Specification (PS) 16 of Appendix B-Performance Specifications and Appendix F-Quality Assurance Procedures to Part 60, which consist of passing an initial and follow-up relative accuracy test, and conducting periodic quality assurance (QA) assessments. Using PEMS, the permittee must submit an application request and obtain approval by the USEPA. Administrator in accordance with 40 CFR §60.13(i) and the most current version of Emissions Measurement Center Guideline Document EMC GD-022 before using the NO<sub>x</sub> PEMS for demonstrating compliance with 40 CFR §60.44b.

For purposes of calculating data averages, the permittee cannot use data recorded during periods of monitoring malfunctions, associated repairs, out-of-control periods, required quality assurance or control activities. The permittee must use all the data collected during all other periods in assessing compliance with the emission limit permitted in Condition 4.1.4. Any periods for which the monitoring system is out of control and data are not available for required calculations constitute a deviation from the monitoring requirements. Records of all data collected, calibrations, calibration checks, relative accuracy tests, maintenance performed, and malfunctions of the CEMS/PEMS shall be maintained in accordance with Condition 3.4.1. of this permit.

**[40 CFR §§60.48b(b) though (f) and 45 CSR 13-5.11]**

#### **4.3. Testing Requirements**

- 4.3.1. The permittee shall conduct testing for demonstrating compliance with the PM limits of Conditions 4.1.1.a.ii., 4.1.2.a.ii., and 4.1.3.a.ii. in accordance with 45 CSR §2A-5.2.a. and Condition 3.3.1. In conjunction with this PM demonstration, the permittee shall demonstrate compliance with the visible emission standards of Condition 4.1.4 using Method 9 with respect to the unit being tested. The determination of the timing shall be based on the weight allowable for each unit established by 45 CSR §2-4.1.b. in accordance with frequency prescribed in §2A-5.2.a. Records of such testing shall be maintained in accordance with Condition 3.4.1. of this permit.

Once the natural gas conversion of No.5 Boiler is complete, the periodical testing requirement of this condition is no longer required per 45 CSR §2A-3.1.b.  
[45 CSR §2-8.1., 45CSR §§2A-5.1.a and 5.2.a.]

- 4.3.2. The permittee shall determine if the hydrogen gas produced at the facility meets the specification as stated in Condition 4.1.4.e. by using the approved site-specific fuel analysis plan for sampling and analyzing the hydrogen gas that is to be used as fuel in No. 6 Boiler no later than July 31, 2016.  
[40 CFR §63.7510(e)]

#### **4.4. Recordkeeping Requirements**

- 4.4.1. **Record of Monitoring.** The permittee shall keep records of monitoring information that include the following:
- a. The date, place as defined in this permit, and time of sampling or measurements;
  - b. The date(s) analyses were performed;
  - c. The company or entity that performed the analyses;
  - d. The analytical techniques or methods used;
  - e. The results of the analyses; and
  - f. The operating conditions existing at the time of sampling or measurement.
- 4.4.2. **Record of Maintenance of Air Pollution Control Equipment.** For all pollution control equipment listed in Section 1.0, the permittee shall maintain accurate records of all required pollution control equipment inspection and/or preventative maintenance procedures.
- 4.4.3. **Record of Malfunctions of Air Pollution Control Equipment.** For all air pollution control equipment listed in Section 1.0, the permittee shall maintain records of the occurrence and duration of any malfunction or operational shutdown of the air pollution control equipment during which excess emissions occur. For each such case, the following information shall be recorded:
- a. The equipment involved.
  - b. Steps taken to minimize emissions during the event.
  - c. The duration of the event.

- d. The estimated increase in emissions during the event.

For each such case associated with an equipment malfunction, the additional information shall also be recorded:

- e. The cause of the malfunction.
- f. Steps taken to correct the malfunction.
- g. Any changes or modifications to equipment or procedures that would help prevent future recurrences of the malfunction.

- 4.4.4. The permittee shall keep records of fuel consumed by each boiler on a daily basis, which includes natural gas usage. For the purpose of demonstrating that the natural gas has insignificant amount of sulfur, the permittee shall keep fuel receipts (such as a, valid purchase contract, tariff sheet, or transportation contract) from the natural gas supplier.

Once the natural gas conversion for No. 6 Boiler has been completed, the permittee shall calculate the annual capacity factor for natural gas. The annual capacity factor is determined on a 12-month rolling average basis with a new annual capacity factor calculated at the end of each calendar month. Such records shall be maintained in accordance with Condition 3.4.1.

[45CSR §2-7.1.a.6., and 45 CSR §10-8.3.c.][No. 6 Boiler only – 40 CFR §§60.49b(d)(2), (r)(1)]

- 4.4.5. The permittee shall maintain records of the monitoring as required in Conditions 4.2.3. and 4.2.4. for each steam generating unit operating day, which at least the following information:
  - a. Calendar date;
  - b. The average hourly NO<sub>x</sub> and CO emission rate in terms of lb per MMBtu heat input;
  - c. The 30-day average NO<sub>x</sub> and CO emission rates calculated at the end of each steam generating unit operating day for the preceding 30 steam generating unit operating days;
  - d. Identification of steam generating unit operating days when the calculated 30 day average NO<sub>x</sub> or CO emission rates are in excess of the respective limits in Conditions 4.1.3. and 4.1.4. with reasons for such excess emissions and description of corrective actions taken;
  - e. Identification of the steam generating unit operating days for which pollutant data have not been obtained, include reasons for not obtaining sufficient data and a description of corrective actions taken;
  - f. Identification of the times when emission data have been excluded from the calculation of average emission rates and the reasons for excluding data;
  - g. Identification of the times when the pollutant concentration exceeded full span of the CEMS;
  - h. Description of any modifications to the CEMS or PEMS that could affect the ability of the CEMS or PEMS to comply with respective PS; and
  - i. Results of daily CEMS drift tests and quarterly accuracy assessments as required Appendix F, Procedure 1 or Part 75.

#### 4.5. Reporting Requirements

- 4.5.1. The permittee shall submit to the Director within 45 days of completion of performance evaluation for the CEMS or PEMS for No. 5 Boiler two copies of the performance evaluation report of CEMS or PEMS for each unit and a copy of the Re-Certification Application.  
**[40 CSR §40-74.3. and 40 CFR §75.63.]**
- 4.5.2. The permittee shall submit to the Director within 60 days of completion of performance evaluation for the CEMS or PEMS for No. 6 Boiler two copies of the performance evaluation report of CEMS or PEMS.  
**[40 CFR §60.13(c)(1)]**
- 4.5.3. Once the CEMS or PEMS for No. 5 and No. 6 Boilers has been certified after being converted to natural gas; *Semi-Annual CO and NO<sub>x</sub> Excess Emission and Monitoring System Performance Report*: To be included with the facility's Annual and Semi-Annual Title V Compliance Report, the permittee shall submit a report to the Director summarizing CO and NO<sub>x</sub> emissions including periods of startups, shutdowns, malfunctions, and CEMS or PEMS system monitor availability for the reporting period. The reporting period is January 1<sup>st</sup> to June 30<sup>th</sup> and July 1<sup>st</sup> to December 31<sup>st</sup>. Such report shall contain the information collected during the respective reporting period as required in Condition 4.4.5. Any emissions data that indicates that the limits as stated in Section 4.1. were exceeded during the corresponding reporting period must be noted in this summary report. At the minimum, the date and time, length of the exceedances(s), magnitude, percentage of excess emissions, the limit that was exceeded, the cause of the exceedances, and the corrective action taken shall be included in the summary report. Submittal of 40 CFR 75 data (NO<sub>x</sub>) in electronic data reporting (EDR or XML) format to the Administrator shall be deemed to satisfy the reporting requirements of this condition for NO<sub>x</sub> emissions from No. 5 Boiler, except that excess NO<sub>x</sub> emission from No. 5 Boiler shall be included in this report.  
**[40 CFR §60.7(c); 40 CFR §§60.49b(h) and (2)(ii); and 45CSR§13-3]**
- 4.5.4. The permittee shall develop and submit a site-specific fuel analysis plan for the hydrogen fuel for determining if it meets the specification in Condition 4.1.4.e. Such plan must follow or conform to the procedures and requirements in 40 CFR §§63.7521(g)(1), (2), and item 3 of Table 6 to Subpart DDDDD of Part 63 to the Director by no later than July 31, 2015.  
**[40 CFR §63.7521(g)]**
- 4.5.5. The permittee shall submit a "Notification of Compliance Status" to the Director before the close of business on the sixtieth (60<sup>th</sup>) day after completion of the initial compliance demonstration as required in 40 CFR §63.7530(e) and (g). Such "Notification of Compliance Status" shall be in accordance with 40 CFR §63.9(h)(2)(ii) and contain the information specified in 40 CFR §§63.7545(e)(1), (2), (6), (7) and (8), which included a statement the one time energy assessment was completed as required in Condition 4.1.7., the initial tune-up for each unit was completed and the initial fuel analysis was conducted according to §63.7525 for the hydrogen gas and meet the specifications as an "other gas (1) fuel" (Condition 4.1.4.e.).  
**[40CFR§63.7545(e), §63.7530(e) and (g)]**
- 4.5.6. The permittee shall submit "5 year Compliance Report" to the Director for No. 5 and No. 6 Boilers with the first report being submitted by no later than January 31, 2016, or the first January 31 following the initial tune-up of the unit, and subsequent reports are due every 5 years from thereafter. Such reports shall contain the information specified in 40 CFR §§63.7550(c)(5)(i) through (iv) and (xiv) which are:
- a. Permittee and facility name, and address;

- b. Process unit information, emission limitations, and operating limitations;
  - c. Date of report and beginning and ending dates of the reporting period;
  - d. The total operating time during the reporting period of each affected unit;
  - e. Include the date of the most recent tune-up for the boiler; and
  - f. Include the date of the most recent burner inspection if it was not done within 5 year tune-up and was delayed until the next scheduled or unscheduled unit shutdown.
- [40CFR §§63.7550(b), (b)(1), (c)(1), & (c)(5)(i) through (iv) and (xiv)]**

## CERTIFICATION OF DATA ACCURACY

I, the undersigned, hereby certify that, based on information and belief formed after reasonable inquiry, all information contained in the attached \_\_\_\_\_, representing the period beginning \_\_\_\_\_ and ending \_\_\_\_\_, and any supporting documents appended hereto, is true, accurate, and complete.

Signature<sup>1</sup>

(please use blue ink)

\_\_\_\_\_  
Responsible Official or Authorized Representative

\_\_\_\_\_  
Date

Name & Title

(please print or type)

\_\_\_\_\_  
Name

\_\_\_\_\_  
Title

Telephone No. \_\_\_\_\_

Fax No. \_\_\_\_\_

<sup>1</sup> This form shall be signed by a "Responsible Official." "Responsible Official" means one of the following:

- a. For a corporation: The president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit and either:
  - (i) the facilities employ more than 250 persons or have a gross annual sales or expenditures exceeding \$25 million (in second quarter 1980 dollars), or
  - (ii) the delegation of authority to such representative is approved in advance by the Director;
- b. For a partnership or sole proprietorship: a general partner or the proprietor, respectively;
- c. For a municipality, State, Federal, or other public entity: either a principal executive officer or ranking elected official. For the purposes of this part, a principal executive officer of a Federal agency includes the chief executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., a Regional Administrator of USEPA); or
- d. The designated representative delegated with such authority and approved in advance by the Director.



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west virginia department of environmental protection

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Division of Air Quality  
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Charleston, WV 25304-2345  
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Jim Justice, Governor  
Austin Caperton, Cabinet Secretary  
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## ENGINEERING EVALUATION/FACT SHEET

### BACKGROUND INFORMATION

Application No.:	R14-0027E
Plant ID No.:	051-00002
Applicant:	Eagle Natrium, LLC
Facility Name:	Natrium Plant
Location:	Near Proctor, Marshall County
SIC/NAICS Code:	(2812, 2865)/(325181, 325110)
Application Type:	Modification
Received Date:	February 21, 2017
Engineer Assigned:	Joe Kessler, PE
Fee Amount:	\$4,500.00
Date Paid:	February 22, 2017
Complete Date:	March 13, 2017
Due Date:	June 11, 2017
Applicant Ad Date:	February 22, 2017
Newspaper:	<i>Moundsville Daily Echo</i>
UTM's:	Easting: 512.7 km Northing: 4,399.6 km Zone: 17
Latitude/Longitude:	39.74806°/-80.84889°
Description:	Installation of a 99.9 mmBtu/hr Babcock & Wilcox Model RB-747 natural gas-fired boiler.

*Entire Document*  
**NON-CONFIDENTIAL**

Eagle Natrium, LLC (Eagle) owns and operates a Chlor-Alkali and Derivatives Plant near Proctor in Marshall County, West Virginia commonly known as the "Natrium Plant." In 1941, the U.S. Government purchased the current plant site and began to drill the salt bed to produce the brine needed to produce chlorine (Cl<sub>2</sub>) and caustic soda (NaOH). In addition to producing Cl<sub>2</sub> and NaOH, the current facility now produces hydrogen gas (H<sub>2</sub>), hydrochloric acid (HCl), and calcium hypochlorite [Ca(OCl)<sub>2</sub>]. The facility was formerly owned and operated by PPG Industries, Inc. Effective January 28, 2013, Georgia Gulf Corporation and the commodity chemicals division of PPG Industries, Inc. merged to form a new company named Axiall. The facility is now referred to as Eagle Natrium LLC, which is a subsidiary of the Axiall Corporation.

The facility received its first air permit under 45CSR13 in 1974 and has been the subject of numerous permitting actions since that time. Currently, according to the last issued Title V Permit, the facility is operating under the authority of the following permits: R13-1527, R13-1664, R13-2046G, R13-2886, R13-3328, and R14-0027D.

R14-0027D covers only the facility power plant and has requirements for Boilers 3 through 6 (Boilers 1 and 2 have been permanently shut down). This permit was originally issued on June 2, 1980 as Permit Number R13-0580 for a modification of Boiler 3. The modification allowed PPG (the facility owner at the time) to change the boiler set-up from stoker-fired to combustng pulverized coal. Prior to this modification, the boiler had been shut-down for a long period of time. On October 8, 1980, EPA issued Permit Number "PSD 79WV06" for this modification of Boiler No. 3 (although both permits included limits for Boilers 3 through 5). At the time of the modification, WV was not authorized as a SIP-approved state to run the PSD program or delegated by the EPA to administer the PSD program. Therefore, the required PSD permit for the restart of the boiler was issued by EPA. On December 6, 2004, Permit Number R14-0027 was issued that superseded both R13-0580 and PSD 79WV06 for the removal of the 4.5% excess oxygen limit on Boiler 3 to allow for optimum operation of the low-NO<sub>x</sub> burners. Although only a small change, the permit was reviewed and issued under the authority of 45CSR14 so as to appropriately transfer the responsibility of enforcing an EPA-issued PSD permit to WV. Since that time, R14-0027 has been modified four times:

- On March 28, 2007, R14-0027A was issued to implement control technology to achieve the required SO<sub>2</sub> reduction to meet compliance with the Best Available Retrofit Control Technology (BART) regulation;
- On April 23, 2008, R14-0027B was issued as a Class I Administrative Update to make emission limits placed on the No. 5 Boiler effective immediately rather than within 5 years of the BART compliance deadline in order to be exempt from BART requirements;
- On July 8, 2013, Permit Application R14-0027C was withdrawn; and
- On July 1, 2014, R14-0027D was issued to (1) convert Boiler 5 from coal to natural gas and (2) to authorize Boiler 6 to burn either hydrogen or natural gas at 100% of the unit's rated input.

## **DESCRIPTION OF PROCESS/MODIFICATIONS**

Eagle is now proposing the temporary construction and operation of a trailer mounted 99.9 mmBtu/hr Babcock & Wilcox Model RB-747 natural gas-fired boiler (R200). The boiler, which will be rented from Ware, Inc., will be installed for use until a new project to convert the previously shutdown coal-fired boiler (Boiler 4) to natural gas is completed. Although a temporary boiler, as the unit is expected to be in use on-site longer than 180 days, so for regulatory purposes, it will not be considered a "temporary" boiler.

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## SITE INSPECTION

Due to the nature of the proposed modification, the author did not perform a site inspection of the facility for this permitting action. The facility was last “Full On-Site” inspected by DAQ Compliance/ Enforcement (C/E) Inspector Douglas Hammell on July 27, 2016. This inspection found the facility be “Status 30 - In Compliance.”

## ESTIMATE OF EMISSION BY REVIEWING ENGINEER

The potential-to-emit (PTE) from the 99.9 mmBtu/hr Babcock & Wilcox Model RB-747 natural gas-fired boiler (S200) was based on emission factors provided by the boiler vendor, and as given in AP-42, Section 1.4 (AP-42 is a database of emission factors maintained by USEPA). Hourly emissions were based on the maximum design heat input (MDHI) of the boiler. Annual emissions were based on 8,760 hours of operation per year. The following table details the PTE of the boiler:

**Table 1: Rental Boiler PTE**

Pollutant	Emission Factor	Source	Hourly (lb/hr)	Annual (ton/yr)
CO	0.075 lb/mmBtu	Boiler Vendor	7.49	32.82
NO <sub>x</sub>	0.0365 lb/mmBtu	Boiler Vendor	3.65	15.97
PM <sub>2.5</sub> /PM <sub>10</sub> /PM <sup>(1)</sup>	0.005 lb/mmBtu	Boiler Vendor	0.50	2.19
SO <sub>2</sub> <sup>(2)</sup>	5.88 x 10 <sup>-4</sup> lb/mmBtu	AP-42, Table 1.4-2	0.06	0.26
VOCs	0.004 lb/mmBtu	Boiler Vendor	0.40	1.75
Total HAPs <sup>(2)</sup>	Various	AP-42, Table 1.4-3	0.18	0.81

(1) All particulate matter emissions are assumed to PM<sub>2.5</sub> or less. Includes condensables.

(2) As calculated by the writer.

## REGULATORY APPLICABILITY

The following will discuss each rule applicable or potentially applicable to only the modifications evaluated herein.

### ***45CSR2: To Prevent and Control Particulate Air Pollution from Combustion of Fuel in Indirect Heat Exchangers***

Pursuant to the definition of “fuel burning unit” under 45CSR2 (“producing heat or power by indirect heat transfer”), 45CSR2 will apply to the proposed new 99.9 mmBtu/hr Babcock & Wilcox Model RB-747 natural gas-fired boiler and is, therefore, subject to the applicable requirements therein. Each substantive 45CSR2 requirement is discussed below.

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### 45CSR2 Opacity Standard - Section 3.1

Pursuant to 45CSR2, Section 3.1, the boiler is subject to an opacity limit of 10%. Proper maintenance and operation of the unit (and the use of natural gas as fuel) should keep the opacity of the unit well below 10% during normal operations.

### 45CSR2 Weight Emission Standard - Section 4.1.b

The allowable particulate matter (non-condensable total particulate matter) emission rates for the unit (as part of a facility-wide 45CSR2 fuel burning allowable emission rate), identified as a Type “b” fuel burning unit, per 45CSR2, Section 4.1(a), is the product of 0.09 and the total design heat input of the unit in million Btu per hour. The maximum aggregate design heat input (short-term) of the boiler is 99.90 mmBtu/hr. Using the above equation, the 45CSR2 particulate matter emission limit of the boiler is 8.99 lb/hr. The maximum potential hourly PM emissions (including condensables) from the boiler is estimated to be 0.50 lb/hr. This emission rate is in compliance with the 45CSR2 limit.

### 45CSR2 Testing, Monitoring, Record-keeping, & Reporting (TMR&R) - Section 8

Section 8 of Rule 2 requires testing for initial compliance with the limits therein, monitoring for continued compliance, and keeping records of that compliance. The TMR&R requirements are clarified under 45CSR2A and discussed below.

### 45CSR2A Applicability - Section 3

Pursuant to §45-2A-3, as an individual applicable “fuel burning unit” under 45CSR2 with an MDHI less than 100 mmBtu/hr, the boiler is not subject to the Testing and MRR Requirements under 45CSR2A.

### ***45CSR10: To Prevent and Control Air Pollution from the Emission of Sulfur Oxides***

45CSR10 has requirements limiting SO<sub>2</sub> emissions from “fuel burning units,” limiting in-stack SO<sub>2</sub> concentrations of “manufacturing processes,” and limiting H<sub>2</sub>S concentrations in process gas streams. The proposed new boiler is defined as a “fuel burning unit” and subject to the applicable requirements discussed below.

### 45CSR10 Fuel Burning Units - Section 3

The allowable SO<sub>2</sub> emission rates for the new boiler (facility located in Priority Classification I), identified as a Type “b” fuel burning unit, per 45CSR10, Section 3.1(e), is the product of 3.1 and the total design heat input of the unit in million Btu per hour (as part of a facility-wide 45CSR10 fuel burning allowable emission rate). The maximum aggregate design heat input (short-term) of the boiler is 99.9 mmBtu/hr. Using the above equation, the 45CSR10 SO<sub>2</sub> emission limit of the boiler is 309.69 lb/hr. The maximum potential hourly SO<sub>2</sub> emissions from the unit is estimated to be 0.06 lb/hr. This emission rate represents only a trace of the 45CSR10 limit.

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## 45CSR10 Testing, Monitoring, Record-keeping, & Reporting (TMR&R) - Section 8

Section 8 of Rule 10 requires to test for initial compliance with the limits therein, monitor for continued compliance, and keep records of that compliance. The TMR&R requirements are clarified under 45CSR10A and discussed below.

### 45CSR10A Applicability - Section 3

Pursuant to §45-10A-3.1(b), as the proposed new boiler combusts “natural gas, wood or distillate oil, alone or in combination,” the unit is not subject to the Testing and MRR Requirements under 45CSR10A.

### ***45CSR13: Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Administrative Updates, Temporary Permits, General Permits, and Procedures for Evaluation***

The proposed installation of the rental boiler will increase the PTE has the potential to increase the PTE of the facility in excess of six (6) lbs/hour and ten (10) TPY of a regulated pollutant (see Table 1 above) and, therefore, pursuant to §45-13-2.17, the changes are defined as a “modification” under 45CSR13. Pursuant to §45-13-5.1, “[n]o person shall cause, suffer, allow or permit the construction, modification, relocation and operation of any stationary source to be commenced without . . . obtaining a permit to construct.” Therefore, Eagle is required to obtain a permit under 45CSR13 for the modification of the facility.

As required under §45-13-8.3 (“Notice Level A”), Eagle placed a Class I legal advertisement in a “newspaper of general circulation in the area where the source is . . . located.” The ad ran on February 22, 2017 in the *Moundsville Daily Echo* and the affidavit of publication for this legal advertisement was submitted on February 28, 2017.

### ***45CSR14: Permits for Construction and Major Modification of Major Stationary Sources of Air Pollution for the Prevention of Significant Deterioration (NON-Applicability)***

The Natrium Plant is an existing “major stationary source” under 45CSR14 and the proposed installation of the 99.9 mmBtu/hr Babcock & Wilcox Model RB-747 natural gas-fired boiler is considered, pursuant to §45-14-2.40, a “physical change or a change in the method of operation.” Therefore, to determine if the project is defined as a “major modification” to the Natrium Plant, pursuant to §45-14-3.4(a), the project is examined under a two-step applicability test: “[A] project is a major modification for a regulated NSR pollutant if it causes two types of emissions increases -- a significant emissions increase (as defined in subsection [§45-14-2.75]), and a significant net emissions increase (as defined in subsections [§45-14-2.46] and [§45-14-2.74]). The proposed project is not a major modification if it does not cause a significant emissions increase. If the proposed project causes a significant emissions increase, then the project is a major modification only if it also results in a significant net emissions increase.”

Therefore, for the proposed installation to meet the definition of a major modification, the installation of the new rental boiler itself must result in a significant emissions increase. The

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methodology for calculating the emissions increase under the first step is given under Sections §45-14-3.4(b), 3.4(c), 3.4(d) and 3.4(f). The substantive language relevant to the changes evaluated herein is given below:

[§45-14-3.4(b)]

The procedure for calculating (before beginning actual construction) whether a significant emissions increase (i.e., the first step of the process) will occur depends upon the type of emissions units being modified, according to subdivisions 3.4.c through 3.4.f.

[§45-14-3.4(d)]

Actual-to-potential test for projects that only involve construction of a new emissions unit(s). -- A significant emissions increase of a regulated NSR pollutant is projected to occur if the sum of the difference between the potential to emit (as defined in subsection 2.58) from each new emissions unit following completion of the project and the baseline actual emissions (as defined in subdivision 2.8.c) of these units before the project equals or exceeds the significant amount for that pollutant (as defined in subsection 2.74).

Based on the PTE of the proposed rental boiler as given under Table 1 above, no PSD pollutant exceeds the significant emissions threshold under 2.74 and, therefore, the proposed installation is not defined as a “major modification” under 45CSR14.

It is important to note, that the above PSD Applicability Analysis is based on treating the proposed installation of the rental boiler as a new project, and not as part of the changes made to Boilers 5 and 6 in 2014. This is based on discussions with Eagle that indicate that after Boiler 4 was shutdown (with intention to be permanent), it was realized that, to account for unanticipated steam demand, additional boiler capacity was needed. This determination resulted in a decision to propose the installation of the rental boiler with the longer-term plan to convert the shutdown Boiler 4 to natural gas (it was previously coal-fired).

#### ***45CSR30: Requirements for Operating Permits***

45CSR30 provides for the establishment of a comprehensive air quality permitting system consistent with the requirements of Title V of the Clean Air Act. The Natrium Plant, defined under Title V as a “major source,” was last issued a Title V permit on April 23, 2013. Proposed changes evaluated herein must also be incorporated into the facility's Title V operating permit (if the proposed rental boiler is used more than 12 months). Commencement of the operations authorized by this permit shall be determined by the appropriate timing limitations associated with Title V permit revisions per 45CSR30.

#### ***40 CFR 60, Subpart Dc: Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units***

40 CFR 60 Subpart Dc is the New Source Performance Standard (NSPS) for industrial-commercial-institutional steam generating units for which construction, modification, or reconstruction is commenced after June 9, 1989 and that have a maximum design heat input capacity between 10 and 100 mmBtu/hr. The proposed boiler is subject to 40 CFR 60, Subpart Dc under the above applicability requirements of §60.40c(a). Subpart Dc does not have any

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Eagle Natrium LLC  
Natrium Plant

emission standards for units that combust only natural gas. The unit is, however, subject to the record-keeping and reporting requirements given under §60.48c.

***40 CFR 63 Subpart DDDDD: National Emission Standards for Hazardous Air Pollutants for Hazardous Air Pollutants Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters***

40 CFR 63, Subpart DDDDD is a federal maximum achievable control technology (MACT) rule that establishes national emission limitations and work practice standards for HAPs emitted from industrial, commercial, and institutional boilers and process heaters located at major sources of HAPs. Pursuant to §63.7485, Subpart DDDD applies to "an industrial, commercial, or institutional boiler or process heater as defined in §63.7575 that is located at, or is part of, a major source of HAPs." As the Natrium Plant is an existing major source of HAPs, the proposed installation of the rental boiler is subject to the applicable requirements of this rule. The proposed rental boiler is not, however, pursuant to §63.7500(e) subject to any emission standards: "Boilers and process heaters in the units designed to burn gas 1 fuels subcategory [includes natural gas] are not subject to the emission limits in Tables 1 and 2 or 11 through 13 to this subpart, or the operating limits in Table 4 to this subpart." However, the unit is subject to the applicable testing, analysis, initial compliance, notification, reporting, and record-keeping requirements as given under §63.7500-§63.7560.

**TOXICITY OF NON-CRITERIA REGULATED POLLUTANTS**

This section provides an analysis for those regulated pollutants that may be emitted from the proposed rental boiler and that are not classified as "criteria pollutants." Criteria pollutants are defined as Carbon Monoxide (CO), Lead (Pb), Oxides of Nitrogen (NO<sub>x</sub>), Ozone, Particulate Matter (PM<sub>10</sub>, and PM<sub>2.5</sub>), and Sulfur Dioxide (SO<sub>2</sub>). These pollutants have National Ambient Air Quality Standards (NAAQS) set for each that are designed to protect the public health and welfare. Other pollutants of concern, although designated as non-criteria and without national concentration standards, are regulated through various federal programs designed to limit their emissions and public exposure. These programs include federal source-specific Hazardous Air Pollutants (HAPs) standards promulgated under 40 CFR 61 (NESHAPS) and 40 CFR 63 (MACT). Any potential applicability to these programs were discussed above under REGULATORY APPLICABILITY.

The majority of non-criteria regulated pollutants fall under the definition of HAPs which, with some revision since, were 188 compounds identified under Section 112(b) of the Clean Air Act (CAA) as pollutants or groups of pollutants that EPA knows or suspects may cause cancer or other serious human health effects. As it is combusting natural gas, the proposed rental boiler does not have, with the exception of n-Hexane and formaldehyde, the potential to increase HAPS in any substantive amount (> 20 pounds/year). There is a potential, however, for the boiler to emit n-Hexane and formaldehyde over this amount (0.77 and 0.02 tons per year, respectively). The following table lists each of these HAP's carcinogenic risk (as based on analysis provided in the Integrated Risk Information System (IRIS)):

R14-0027E  
Eagle Natrium LLC  
Natrium Plant

**Table 2: Potential HAPs - Carcinogenic Risk**

HAPs	Type	Known/Suspected Carcinogen	Classification
n-Hexane	VOC	No	Inadequate Data
Formaldehyde	VOC	Yes	B1 - Probable Human Carcinogen

All HAPs have other non-carcinogenic chronic and acute effects. These adverse health effects may be associated with a wide range of ambient concentrations and exposure times and are influenced by source-specific characteristics such as emission rates and local meteorological conditions. Health impacts are also dependent on multiple factors that affect variability in humans such as genetics, age, health status (e.g., the presence of pre-existing disease) and lifestyle. As stated previously, there are no federal or state ambient air quality standards for these specific chemicals. For a complete discussion of the known health effects of each compound refer to the IRIS database located at [www.epa.gov/iris](http://www.epa.gov/iris)

### **AIR QUALITY IMPACT ANALYSIS**

The proposed modification does not meet the definition of a “major modification” pursuant to 45CSR14 and, therefore, an air quality impact (computer modeling) analysis was not required. Additionally, based on the nature of the proposed modification, modeling was not required under 45CSR13, Section 7.

### **MONITORING, COMPLIANCE DEMONSTRATIONS, RECORD-KEEPING, AND REPORTING REQUIREMENTS**

As the emission limits of the proposed rental boiler have been calculated at MDHI and operating 8,760 hours/year, there is no required fuel use or hours of operation monitoring. Nominal record-keeping and reporting is required under 40 CFR Subpart Dc and 43 CFR 63, Subpart DDDDD.

### **PERFORMANCE TESTING OF OPERATIONS**

There are no performance testing requirements for the proposed rental boiler.

### **CHANGES TO PERMITS R14-0027D**

The following substantive changes were made to Permit Number R14-0027D:


- The proposed 99.9 mmBtu/hr Babcock & Wilcox Model RB-747 natural gas-fired boiler was added to Emissions Units Table 1.0;

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Eagle Natrium LLC  
Natrium Plant

- Emission limits, operating requirements, and rule applicability relating to the proposed rental boiler were all added under requirement 4.1.10 of the draft permit. All requirements relating to the new boiler were added under one requirement so as to facilitate easy removal from the permit when the rental boiler will no longer be used; and
- The draft permit was revised throughout by removing all references to the shutdown process of Boilers 4 and 5 (which were permanently shutdown on July 8, 2016 and August 6, 2016, respectively) and the conversion process of Boiler 5 to gas firing (which was completed in 2016).

### **RECOMMENDATION TO DIRECTOR**

The information provided in permit application R14-0027E indicates that compliance with all applicable federal and state air quality regulations will be achieved. Therefore, I recommend to the Director the issuance of Permit Number R14-0027E to Eagle Natrium LLC for the proposed installation of the rental boiler discussed herein at the Natrium Plant located near Proctor, Marshall County, WV.

  
\_\_\_\_\_  
Joe Kessler, PE  
Engineer

3/14/17  
\_\_\_\_\_  
Date

R14-0027E  
Eagle Natrium LLC  
Natrium Plant

# INTERNAL PERMITTING DOCUMENT TRACKING MANIFEST

Company Name EAGLE NATRIUM, LLC

Permitting Action Number R14-0027E Total Days 21 DAQ Days 1

## Permitting Action:

- |   |                                    |   |
|---|------------------------------------|---|
| <input type="radio"/> Permit Determination  | <input type="radio"/> Temporary    | <input checked="" type="radio"/> Modification |
| <input type="radio"/> General Permit        | <input type="radio"/> Relocation   | <input type="radio"/> PSD (Rule 14)           |
| <input type="radio"/> Administrative Update | <input type="radio"/> Construction | <input type="radio"/> NNSR (Rule 19)          |

## Documents Attached:

- |   |  |
|---|--|
| <input checked="" type="checkbox"/> Engineering Evaluation/Memo   | <input checked="" type="checkbox"/> Completed Database Sheet |
| <input checked="" type="checkbox"/> Draft Permit                  | <input type="checkbox"/> Withdrawal                          |
| <input checked="" type="checkbox"/> Notice                        | <input type="checkbox"/> Letter                              |
| <input type="checkbox"/> Denial                                   | <input type="checkbox"/> Other (specify) _____               |
| <input type="checkbox"/> Final Permit/General Permit Registration | _____  |

Date	From	To	Action Requested
3/14/17	Joe Kessler	Bev McKeone	NOTICE APPROVAL
3/16	Bev	Joe	Auto Notice

NOTE: Retain a copy of this manifest for your records when transmitting your document(s).



## Kessler, Joseph R

---

**From:** Roni Williams <Roni.Williams@axiall.com>  
**Sent:** Tuesday, March 14, 2017 9:16 AM  
**To:** Kessler, Joseph R  
**Subject:** Emission unit Updates

Joe,

To confirm our phone conversation this morning our 3 Boiler was shut down on July 8, 2016; 4 Boiler was shut down on August 6, 2016; 5 Boiler now combust only natural gas; and 6 Boiler now combusts both hydrogen and natural gas.

Roni

**Roni Williams | Specialist Sr. Environmental**

[Roni.williams@axiall.com](mailto:Roni.williams@axiall.com) | 304-451-3573 | cell: 304-815-4601 | fax: 304-455-2422

Axial Corporation, A Westlake Company

15696 Energy Road, State Route 2, Proctor, West Virginia 26055

PO Box 191, New Martinsville, WV 26055



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*Entire Document*  
**NON-CONFIDENTIAL**

ID. No. 051-00002 Reg. 14-00276

Company EAGLE NATRUM

Facility NATRUM Region

Initials *JW*



**Kessler, Joseph R**

---

**From:** Kessler, Joseph R  
**Sent:** Monday, March 13, 2017 11:32 AM  
**To:** jerry.mullens@axiall.com; tom.horan@axiall.com; Roni Williams  
**Cc:** Kessler, Joseph R  
**Subject:** R14-0027E Permit Application Status

**RE: Application Status: Complete**  
**Eagle Natrium, LLC**  
**Natrium Plant**  
**Permit Application: R14-0027E**  
**Plant ID No.: 051-00002**

*Entire Document*  
**NON-CONFIDENTIAL**

Mr. Mullens,

Your application for a construction permit was received by the Division of Air Quality (DAQ) on February 21, 2017 and assigned to the writer for review. Upon an initial review, the application has been deemed complete as of the date of this e-mail. The ninety (90) day statutory time frame began on that day.

This determination of completeness shall not relieve the permit applicant of the requirement to subsequently submit, in a timely manner, any additional or corrected information deemed necessary for a final permit determination.

Should you have any questions, please contact me at (304) 926-0499 ext. 1219 or reply to this email.

Thank You,

Joe Kessler, PE  
Engineer  
West Virginia Division of Air Quality  
601-57th St., SE  
Charleston, WV 25304  
Phone: (304) 926-0499 x1219  
Fax: (304) 926-0478  
[Joseph.r.kessler@wv.gov](mailto:Joseph.r.kessler@wv.gov)

**Kessler, Joseph R**

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**From:** Ward, Beth A  
**Sent:** Wednesday, February 22, 2017 12:11 PM  
**To:** Kessler, Joseph R  
**Subject:** EAGLE NATRIUM LLC PERMIT APPLICAITON FEE

This is the receipt for payment received from:

EAGLE NATRIUM LLC, NATRIUM, CK# 1000029504, CK DATE 02/10/2017, \$4,500.00  
R14-0027E ID 051-00002

OASIS Deposit CR 1700091137

Thank You!

*Beth Ward*

WV DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BTO FISCAL  
601 57<sup>TH</sup> STREET SE  
CHARLESTON, WV 25304  
(304) 926-0499 EXT 1846  
[beth.a.ward@wv.gov](mailto:beth.a.ward@wv.gov)

## UC Defaulted Accounts Search Results

Sorry, no records matching your criteria were found.

---

FEIN:

Business name: EAGLE NATRIUM LLC

Doing business as/Trading

as:

---

Please use your browsers back button to try again.

<a href="#">WorkforceWV</a>	<a href="#">Unemployment Compensation</a>	<a href="#">Offices of the Insurance Commissioner</a>
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## UC Defaulted Accounts Search Results

Sorry, no records matching your criteria were found.

FEIN: 250730780

Business name:

Doing business as/Trading as:

Please use your browsers back button to try again.

<a href="#">WorkforceWV</a>	<a href="#">Unemployment Compensation</a>	<a href="#">Offices of the Insurance Commissioner</a>
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## Kessler, Joseph R

**From:** Roni Williams <Roni.Williams@axiall.com>  
**Sent:** Tuesday, February 28, 2017 1:49 PM  
**To:** Kessler, Joseph R  
**Subject:** Public Notice Affidavit  
**Attachments:** Affidavit from Moundsville ECHO.pdf

**Importance:** High

Joe,

As per our phone conversation here is a scanned copy of the affidavit for our Public Notice for the requested boiler permit. As discussed this morning only a scanned copy is required and no paper copy will be sent via postal mail.

Thanks,  
Roni

**Roni Williams | Specialist Sr. Environmental**  
[Roni.williams@axiall.com](mailto:Roni.williams@axiall.com) | 304-451-3573 | cell: 304-815-4601 | fax: 304-455-2422  
Axial Corporation, A Westlake Company  
15696 Energy Road, State Route 2, Proctor, West Virginia 26055  
PO Box 191, New Martinsville, WV 26055

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**ID. No.** 051-00002 **Reg.** 14-0027E

**Company** EAGLE NATURAL GAS

**Facility** NATURAL GAS **Region** \_\_\_\_\_

**Initials** JNL







(304) 845-2660  
P.O. BOX 369  
MOUNDSVILLE  
WEST VIRGINIA  
26041

AFFIDAVIT OF PUBLICATION

STATE OF WEST VIRGINIA,  
COUNTY OF MARSHALL, to wit

I, Melanie S. Murdock being first duly sworn upon my oath, do depose and say:

- that I am Legal Advertising Manager of the MOUNDSVILLE DAILY ECHO, a Republican newspaper;
- that I have been duly authorized to execute this affidavit;
- that such newspaper has been published for over 119 years, is regularly published afternoons daily except Saturdays and Sundays, for at least fifty weeks during the calendar year, in the municipality of Moundsville, Marshall County, West Virginia;
- that such newspaper is a newspaper of "general circulation" as defined in Art. 3, Chap. 59 of the Code of West Virginia 1931 as amended, within Moundsville and Marshall County;
- that such newspaper averages in length four or more pages, exclusive of any cover, per issue;
- that such newspaper is circulated to the general public at a definite price or consideration;
- that such newspaper is a newspaper to which the general public resorts for passing events of a political, religious, commercial and social nature and for current happenings, announcements, miscellaneous reading matters, advertisements and other notices;
- and that the annexed notice described as follows:

Legal Advertisement

PARTY(ies)

Air Quality Permit / Portable Boiler - Energy Rd.

NATURE (and agency if heard before one)

CERTIF-BILL TO

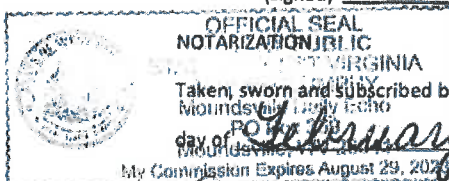
Pam Bennett  
Axial Corporation  
P.O. Box 191  
New Martinsville, WV 26155

WAS PUBLISHED IN- SAID NEWSPAPER AS FOLLOWS

Times	Dates
1	February 22, 2017

BY WORDS	PUBLICATION CHARGES
266.5	\$30.65

(signed) *Pam Bennett*



Taken, sworn and subscribed before me this 23rd

day of February 2017

My Commission Expires August 29, 2020

Notary Public

Amy McElmurry

Monday, February 22, 2017 - Mounds

**LEGAL ADVERTISEMENT**  
**AIR QUALITY PERMIT NOTICE**  
**Notice of Application**

Notice is given that Axial Corporation/Eagle Natrium LLC has applied to the West Virginia Department of Environmental Protection, Division of Air Quality, for a modification permit for a portable boiler to be located on 15696 Energy Road, Dector, WV 26055 near New Martinsville in Marshall County, West Virginia. The latitude and longitude coordinates are: 39.748056 and -80.848889.

The applicant estimates an increase in potential to discharge the following regulated air pollutants: 15.97 tons per year Nitrogen Oxides, 32.82 tons per year Carbon Monoxide, 6.57 tons per year PM, 1.75 tons per year VOC, and 51,344 tons per year CO<sub>2</sub>.

Commencement of the modification activities is planned to begin on or about the 17th day of April, 2017. Written comments will be received by the West Virginia Department of Environmental Protection, Division of Air Quality, 601 57th Street, SE, Charleston, WV 25304, for at least 30 calendar days from the date of publication of this notice.

Any questions regarding this permit application should be directed to the DAQ at (304) 926-0499, extension 1250, during normal business hours. Dated this 17th day of February 2017.

By: Axial Corporation  
Eagle Natrium, LLC  
Jerry Mullens  
Works Manager  
P.O. Box 191  
New Martinsville, WV 26155  
PUBLISH: February 22, 2017.

**Adkins, Sandra K**

---

**From:** Adkins, Sandra K  
**Sent:** Wednesday, February 22, 2017 9:56 AM  
**To:** 'jerry.mullens@axiall.com'; 'tom.horan@axiall.com'  
**Cc:** McKeone, Beverly D; Kessler, Joseph R  
**Subject:** WV DAQ Permit Application Status for Eagle Natrium LLC; Natrium

**RE: Application Status  
Eagle Natrium LLC  
Natrium  
Facility ID No. 051-00002  
Application No. R14-0027D**

*Entire Document*  
**NON-CONFIDENTIAL**

Mr. Mullens,

Your application for a modification permit for the Natrium Facility was received by this Division on February 21, 2017, and was assigned to Joe Kessler. The following item was not included in the initial application submittal:

**Original affidavit for Class I legal advertisement not submitted.**

*This item is necessary for the assigned permit writer to continue the 30-day completeness review.*

Within 30 days, you should receive a letter from Joe stating the status of the permit application and, if complete, given an estimated time frame for the agency's final action on the permit.

Any determination of completeness shall not relieve the permit applicant of the requirement to subsequently submit, in a timely manner, any additional or corrected information deemed necessary for a final permit decision.

In the future, please submit one original and two electronic versions of the application. Electronic versions should contain signatures.

Should you have any questions, please contact the assigned engineer, Joe Kessler, at 304-926-0499, extension 1219.

